

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 20240007-EI

DATED: October 11, 2024

COMMISSION STAFF'S PREHEARING STATEMENT

Pursuant to Order No. PSC-2024-0031-PCO-EI, filed February 6, 2024, the Staff of the Florida Public Service Commission files its Prehearing Statement.

1. All Known Witnesses

There are no known witnesses at this time.

2. All Known Exhibits

There are no known exhibits at this time.

3. Staff's Statement of Basic Position

Staff's positions are preliminary and based on materials filed by the parties and on discovery. The preliminary positions are offered to assist the parties in preparing for the hearing. Staff's final positions will be based upon all the evidence in the record and may differ from the preliminary positions stated herein.

4. Staff's Position on the Issues

GENERIC ENVIRONMENTAL COST RECOVERY ISSUES

ISSUE 1: What are the final environmental cost recovery true-up amounts for the period of January 2023 through December 2023?

POSITION: Staff has no position at this time.

ISSUE 2: What are the actual/estimated environmental cost recovery true-up amounts for the period of January 2024 through December 2024?

POSITION: Staff has no position at this time.

ISSUE 3: What are the projected environmental cost recovery true-up amounts for the period of January 2025 through December 2025?

POSITION: Staff has no position at this time.

ISSUE 4: What are the environmental cost recovery amounts, including true-up amounts, for the period January 2025 through December 2025?

POSITION: Staff has no position at this time.

ISSUE 5: What depreciation rates should be used to develop the depreciation expense included in the total environmental cost recovery amounts for the period of January 2025 through December 2025?

POSITION: Staff has no position at this time.

ISSUE 6: What are the appropriate jurisdictional separation factors for the projected period January 2025 through December 2025?

POSITION: Staff has no position at this time.

ISSUE 7: What are the appropriate environmental cost recovery factors for the period January 2025 through December 2025 for each rate group?

POSITION: Staff has no position at this time.

ISSUE 8: What should be the effective date of the new environmental cost recovery factors for billing purposes?

POSITION: Staff has no position at this time.

ISSUE 9: Should the Commission approve revised tariffs reflecting the environmental cost recovery amounts and environmental cost recovery factors determined to be appropriate in this proceeding?

POSITION: Staff has no position at this time.

ISSUE 10: Should this docket be closed?

POSITION: Staff has no position at this time.

COMPANY-SPECIFIC ENVIRONMENTAL COST RECOVERY ISSUES

Duke Energy Florida, LLC (DEF)

ISSUE 11: Should the Commission approve DEF's Citrus Combined Cycle (CCC) Water Treatment System Project for cost recovery through the ECRC?

POSITION: Staff has no position at this time.

ISSUE 12: How should the approved costs related to DEF's CCC Water Treatment System Project be allocated to the rate classes?

POSITION: Staff has no position at this time.

Tampa Electric Company (TECO)

ISSUE 13: Should the Commission approve TECO's Bayside 316 (a) Thermal Variance Study Project for cost recovery through the ECRC?

POSITION: Staff has no position at this time.

ISSUE 14: How should the approved costs related to TECO's Bayside (a) Thermal Variance Study Project be allocated to the rate classes?

POSITION: Staff has no position at this time.

5. Stipulated Issues

There are no stipulated issues at this time.

6. Pending Motions

There are none.

7. Pending Confidentiality Claims or Requests

There are none.

8. Objections to Witness Qualifications as an Expert

Staff has no objections.

9. Compliance with Order No. PSC-2024-0031-PCO-EI

Staff has complied with all requirements of the Order Establishing Procedure entered in this docket.

Respectfully submitted this 11th day of October, 2024.

/s/ Jacob Imig

JACOB IMIG

Senior Attorney, Office of the General Counsel

FLORIDA PUBLIC SERVICE COMMISSION

2540 Shumard Oak Boulevard

Tallahassee, Florida 32399-0850

Telephone: (850) 413-6199

jimig@psc.state.fl.us

discovery-gcl@psc.state.fl.us

BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In re: Environmental cost recovery clause.

DOCKET NO. 20240007-EI

DATED: October 11, 2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that STAFF'S PREHEARING STATEMENT has been filed with the Office of Commission Clerk and that a true copy has been furnished to the following by electronic mail this 11th day of October, 2024:

Maria Jose Moncada
Joel Baker
Florida Power & Light Company
700 Universe Blvd.
Juno Beach, FL 33408
Maria.Moncada@fpl.com
Joel.Baker@fpl.com

Kenneth A. Hoffman
Florida Power & Light Company
134 W. Jefferson Street
Tallahassee, FL 32301
Ken.hoffman@fpl.com

Matthew R. Bernier, Esq.
Stephanie A. Cuello
Robert L. Pickels
106 East College Avenue, Suite 800
Tallahassee, Florida 32301
matt.bernier@duke-energy.com
stephanie.cuello@duke-energy.com
robert.pickels@duke-energy.com
fregulatorylegal@duke-energy.com

Dianne M. Triplett
299 First Avenue North
St. Petersburg, Florida 33701
Dianne.triplett@duke-energy.com

Paula K. Brown
Tampa Electric Company
Post Office Box 111
Tampa, Florida 33601
regdept@tecoenergy.com

J. Jeffrey Wahlen
Malcolm Means
Virginia Ponder
Ausley McMullen
Post Office Box 391
Tallahassee, Florida 32302
jwahlen@ausley.com
mmeans@ausley.com
vponder@ausley.com

Walt Trierweiler/ Charles Rehwinkel/
Mary A. Wessling/ Patricia A. Christensen/
Octavio Ponce/ Austin Watrous
Office of Public Counsel
111 W. Madison Street, Room 812
Tallahassee, Florida 32399
Trierweiler.walt@leg.state.fl.us
Rehwinkel.charles@leg.state.fl.us
Wessling.mary@leg.state.fl.us
Christensen.patty@leg.state.fl.us
Ponce.octavio@leg.state.fl.us
Watrous.austin@leg.state.fl.us

James W. Brew/ Laura Wynn Baker/
Sarah B. Newman
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
jbrew@smxblaw.com
lwb@smxblaw.com
sbn@smxblaw.com

Jacob Imig
Saad Farooqi
Office of General Counsel
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399
jimig@psc.state.fl.us
sfarooqi@psc.state.fl.us
discovery-gcl@psc.state.fl.us

Jon C. Moyle, Jr.
Moyle Law Firm, P.A.
118 North Gadsden Street
Tallahassee, FL 32301
jmoyle@moylelaw.com
mqualls@moylelaw.com

Peter J. Mattheis/ Michael K. Lavanga/
Joseph R. Briscar
Stone Mattheis Xenopoulos & Brew, P.C.
1025 Thomas Jefferson Street, NW
Eighth Floor, West Tower
Washington, D.C. 20007
pjm@smxblaw.com
mkl@smxblaw.com
jrb@smxblaw.com

/s/ Jacob Imig

JACOB IMIG
Senior Attorney, Office of the General Counsel
FLORIDA PUBLIC SERVICE COMMISSION
2540 Shumard Oak Boulevard
Tallahassee, Florida 32399-0850
Telephone: (850) 413-6199
jimig@psc.state.fl.us
discovery-gcl@psc.state.fl.us